

THE LAW OFFICE OF GARY KAUFMAN, PLLC

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June 8, 2020

Via ECF

The Honorable Vernon S. Broderick
United States District Judge
Southern District of New York
Thurgood Marshall U.S. Courthouse
40 Foley Square
New York, NY 10007

APPLICATION GRANTED

SO ORDERED 

VERNON S. BRODERICK

U.S.D.J. 6/9/2020

Sentencing in this matter is hereby adjourned to October 16,
2020 at 10:00 a.m.

Re: *United States v. Ziskind, et al.*
18-cr-375-VSB

Dear Honorable Judge Broderick,

I am writing to request an adjournment of the date of Mr. Ziskind's sentencing, which is currently scheduled for July 16, 2020, to a date in September or October that is convenient for the Court, in light of COVID-19 concerns. I have communicated with Assistant United States Attorney Andrew Thomas, who has consented to this adjournment.

Mr. Ziskind and I believe that his sentencing should be held at a time, where it can be done in-person, which may not happen by the currently scheduled date. Additionally, as is explained in the Pre-Sentencing Report produced by the United States Probation Department, Mr. Ziskind's wife, Ilona Shustef, is currently undergoing chemotherapy treatment for cancer, making Ms. Shustef especially high risk for complications from COVID-19.¹ It is expected that this round of chemotherapy will conclude by late summer. As a result of the side effects of chemotherapy and the risks she faces if exposed to COVID-19, Mr. Ziskind is required to attend to Ms. Shustef day and night. By the fall, Ms. Shustef, will be better situated to care for herself.

I am therefore requesting an adjournment of Mr. Ziskind's sentence until a September or October date that is convenient to the Court, to allow Mr. Ziskind to care for his wife during this period of heightened health risk, and to increase the likelihood of an in-person sentencing. I would ask that the Court avoid September 28, 2020, so as to allow for the observance of Yom Kippur.

Thank you for your attention to this matter.

Sincerely,

/s/

GARY M. KAUFMAN, ESQ.
Attorney for Vladimir Ziskind

¹ *Specific questions and answers about COVID-19 for cancer patients*, Mayo Clinic, <https://www.mayoclinic.org/patient-visitor-guide/covid-19-faqs/cancer>. (Last accessed April 24, 2020)

cc: AUSA Robert Boone
AUSA Andrew Thomas